

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
CASE NO. 1:09-CIV-05583 (JFK) (GWG)

CURTIS JAMES JACKSON, III
p/k/a 50 CENT, TOMORROW
TODAY ENTERTAINMENT INC.,
a New York corporation, and
G-UNIT RECORDS, a New York
corporation,

Plaintiffs,

v.

LEE Q. ODENAT, a/k/a "Q," d/b/a
WWW.WORLDSTARHIPHOP.COM,
WORLDSTAR HIP HOP, INC., a Nevada
Corporation; WORLDSTAR, LLC, a Delaware
limited liability company; WSHH337, LLC,
a Delaware limited liability company;
JOHN DOE LLC(S)/CORPORATION(S)

Defendants,

v.

YVES MONDESIR,

Third-Party Defendant.

/

PLAINTIFFS' NOTICE OF MOTION TO BIFURCATE

Plaintiffs CURTIS JAMES JACKSON, III p/k/a 50 CENT, TOMORROW
TODAY ENTERTAINMENT INC., a New York corporation, and G-UNIT RECORDS,
a New York corporation, by and through undersigned counsel, and pursuant to Rules 14
and 42 Fed.R.Civ.P., hereby file this Notice of Motion and state that they seek the entry
of an Order providing that the remaining third-party claims brought by Defendant Odenat
against Third-Party Defendant Mondesir be tried separately, on the grounds set forth in

the supporting Memorandum of Law filed contemporaneously with this Notice of Motion. Opposition papers are due on September 16, 2014 and reply papers are due on September 23, 2014 in accordance with the Court's Order of August 26, 2014 (DE 171).

Respectfully submitted,

GrayRobinson, P.A.
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By: /s/Karen L. Stetson
Karen L. Stetson
Florida Bar No. 742937
Jonathan L. Gaines
Florida Bar No. 330361

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished U.S. Mail and e-mail to: Scott Zarin, Zarin & Associates, P.C., Zarin & Associates P.C., One Penn Plaza, Suite 4615, New York, NY 10119 and to John P. Fazzio, Esq., Fazzio Law Offices, 26 Broadway, 21st Floor, New York, NY 10004 this 2nd day of September, 2014.

By: /s/Karen L. Stetson